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March 25 2014

VIA ECF

Hon. Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: Innovation Ventures, LLC et al. v.
Ultimate One Distributing Corp., et al.,
Civil Action No. 12 Civ. 5354**

Dear Judge Mann:

We represent Defendants Baseline Distributors, Inc. and David Flood (collectively "Baseline") in the above-captioned litigation. We respectfully request a brief extension of time to respond to Plaintiffs' letter seeking to (a) quash and/or limit certain topics noticed for the deposition of Plaintiffs' Rule 30(b)(6) designee, and (b) limit that deposition to one (1) day. (Docket No. 690).

We have conferred with Plaintiffs, who have consented to a brief extension of our time to respond to March 27, 2014.

Very truly yours,

STERN & SCHURIN LLP



Steven Stern

cc: All counsel of record (via ECF)